## **EXHIBIT 1**

## Case 3:17-cv-00072-NKM-JCH Document 808-1 Filed 07/16/20 Page 2 of 3 Pageid#: 11862

## **Denise Lunsford**

From: Platania, Joseph <platania@charlottesville.gov>

**Sent:** Monday, July 06, 2020 3:30 PM

To: Antony, Nina-Alice; Denise Lunsford (d@lunsford-law.com); 'Winn, Sara (USAVAW)';

'Siegel, Joshua'

Subject: RE: State Discovery/ Lunsford SDT

Thanks Nina.

Josh: We did want to add language to the order stating that federal materials that we inadvertently provided to Denise and John are not covered. I think the only federal item that we gave them was Brant Meyer's summary (it was attached to an e-mail I sent as Denise and I were working through some stipulations related to his testimony). You and Sara can sort that out.

Best, Joe

## Joseph Platania Commonwealth's Attorney City of Charlottesville

My email address has changed to <u>platania@charlottesville.gov</u> Please update my email address within your contacts. Thank you.

From: Antony, Nina-Alice <antony@charlottesville.gov>

Sent: Monday, July 6, 2020 2:56 PM

To: Denise Lunsford (d@lunsford-law.com) <d@lunsford-law.com>; Platania, Joseph <platania@charlottesville.gov>;

'Winn, Sara (USAVAW)' <Sara.Winn@usdoj.gov>; 'Siegel, Joshua' <jsiegel@cooley.com>

Subject: State Discovery/ Lunsford SDT

All,

Thank you all for being so patient as we work through the discovery provided by the State government and Federal Government to Lunsford/Hill during the criminal prosecution of James Fields. I have had an opportunity to go through all materials that were provided by Ms. Lunsford as responsive to the SDT she received and in question as to its origin (whether from State or Federal government). Ms. Lunsford has been given a comprehensive list to aid in her discovery response. All material I reviewed were turned over to the defense and were generated through the State investigation of Mr. Fields.

I understand that this is still the matter of a discovery order in the General District Court. Joe and I are happy to facilitate entry of an order which would allow dissemination of the otherwise protected State material to the Plaintiffs in the Sines v. Kessler suit. We have already discussed with them that they are to treat the material as highly confidential.

Please let me know if I can be of assistance in any other way.

Stay healthy,

Nina

Kan Stead

Nina-Alice Antony Senior Assistant Commonwealth's Attorny City of Charlottesville

My email address has changed to <a href="mailto:antony@charlottesville.gov">antony@charlottesville.gov</a>
Please update my email address within your contacts. Thank you.